

**Decision on Action and Application for Categorical Exclusion
For Activities Associated with Oil and Gas Development
Section 390, Energy Policy Act of 2005**

Union Oil Company of California
Swanson River Field, Plant 10 Building Abandonment Project
DOI-BLM-AK-A010-2011-0031-CX
Bureau of Land Management
Anchorage Field Office

Proposed Action

Union Oil Company of California (UOCC), a wholly owned indirect subsidiary of Chevron Corporation, plans to abandon the Plant 10 building in the Swanson River Field (SRF), a facility no longer needed to support operations. The Plant 10 building, associated equipment, related exterior buildings, and skids that are no longer in service will be deconstructed and removed. All work will take place above the concrete slab and ground surface. No disturbance will occur off the pad.

The Plant 10 building is located in the Compressor Plant Area. This site is located within the Kenai National Wildlife Refuge, Seward Meridian, Township 7 North, Range 9 West, Section 4. The project lies within the Soldotna Creek Unit Lease A-028997.

The surface is managed by the U.S. Fish and Wildlife Service, with the mineral estate owned by the Federal government and managed by the Bureau of Land Management.

Description of Proposed Action

UOCC plans to abandon and deconstruct the Plant 10 building, associated equipment, and related exterior buildings and skids. These buildings and slabs will be demolished, disassembled, and salvaged, recycled, or disposed of properly, including the abatement of asbestos, lead-based paint, mercury, and polychlorinated biphenyls (PCBs). The remaining concrete slabs will be temporarily sealed until further concrete and soil remediation commences. The project is expected to be completed in three phases:

- Phase 1 involves removing all buildings and skids currently out of service, with no intended future use, within the abandonment perimeters. This phase would begin in early to mid-June, 2011, and would be completed later in 2011.
- Phase 2 involves relocating the in-service K-8 process equipment outside the abandonment perimeter. This phase would start in 2011 and continue into 2012.
- Phase 3 involves deconstruction and removal of the main Plant 10 Building and remaining buildings, skids, and equipment within the abandonment perimeter. This phase would be initiated and completed in 2012.

The planned approach to the Plant 10 abandonment project is more of a deconstruction of the facility than a conventional demolition because of the operational gas pipelines that run through the middle of the work area that will remain active during and after the project. The systematic isolation of piping and

electrical systems to each skid and/or structure will be conducted. The piping or electrical equipment will be locked out, cut, capped or blind flanged to completely isolate the skid or structure to be deconstructed. All industrial hazards (asbestos, lead, mercury, PCBs, etc.) related to demolition and identified in a Hazardous Building Material Survey and associated sampling, will be addressed by appropriately trained and certified personnel prior to the start of demolition activities.

Once the structure or piece of equipment has been safely isolated, the asbestos-containing materials and asbestos-contaminated debris will be abated. Cranes and scaffold towers will be needed for asbestos abatement of the de-ethanizer heater vessels.

After completion of abatement work where the asbestos-containing material has been removed from each area or skid, the removal/deconstruction of the skid or structure will begin. The skids, structures, and equipment will be disconnected or dismantled to the extent necessary to safely load onto or into a truck for transport to the waste staging area on Well Pad 23-3, which is a previously disturbed area, where they will be further processed and transported offsite to permitted facilities.

Abandoned equipment and building components that have been disassembled from the plant area will be held in a previously disturbed staging area. Equipment, building components, and skids may be disassembled further at the staging area as needed for transportation and/or packaging. A small area of the staging area will be designated as a "hot" work area where the operator will take extra precaution with devices at risk for electrostatic discharge. Another small area will be designated for collection/removal of the residual liquid left in the tanks after they have been drained. No hazardous waste will be accumulated at this area. The prepared abandoned equipment and building materials will be transported off-Refuge for recycling, reuse or disposal.

It is anticipated that up to 12 personnel will be used to conduct the 2011 abandonment work. Up to 15 people will conduct the 2012 abandonment work. Truck drivers will be employed to haul materials and equipment to and from the site as necessary.

Contract personnel performing the abandonment work will commute to the Swanson River Field daily. A multipassenger vehicle will drive personnel to and from the site each day to reduce the amount of vehicles traveling on the road system. The following equipment and quantities needed to complete the work at the site:

- All-terrain crane (1)
- Air compressor (1)
- Generator (1)
- Flatbed truck (1)
- Telescoping man lifts (2)
- Telehandler forklifts (2)
- Tracked excavator with shear (1)

Plan Conformance

As required by 43 CFR 1610.5, the proposed action is in conformance with the terms and conditions of the Approved Resource Management Plan (the Ring of Fire Resource Management Plan and Record of Decision, approved March 2008), for the Public Lands Administered by the Bureau of Land Management, Anchorage Field Office, and with the terms and conditions of the Final Revised Comprehensive Plan and Environmental Impact Statement for the Kenai National Wildlife Refuge, approved August 2009.

Plan of Operations

The proposal is designed in conformance with all bureau standards and incorporates appropriate best management practices, and required and designed mitigation measures determined to reduce the effects on the environment.

Compliance with the Energy Policy Act of 2005

The proposed activity has been determined to be statutorily categorically excluded from NEPA documentation in accordance with Section 390 of the National Energy Policy Act of 2005.

The applicable Categorical Exclusion reference in Section 390 of the Energy Policy Act of 2005 is exclusion number 5: "*Maintenance of a minor activity, other than any construction or major renovation of a building or facility.*"

Persons and Agencies Consulted

Wildlife:

The facility will be located on an existing, previously disturbed area. No new areas will be disturbed as a result of project. Therefore, the proposed action would not affect any threatened or endangered species or their habitats.

Subsistence:

This action will not impact subsistence activities. The surface is managed by the U.S. Fish and Wildlife Service, with the mineral estate owned by the Federal government and managed by the Bureau of Land Management. The proposed action is located on land managed by the FWS within the Kenai National Wildlife Refuge and affects a small piece of land (less than one acre) in an already developed area.

Cultural:

Previous disturbance

This project will occur in an area where previous ground disturbance has modified the surface so extensively that the probability of impacting historic properties is negligible. The Bureau may proceed with the proposed undertaking following the *Alaska State Protocol Agreement*.

Jenny Blanchard, BLM Archaeologist for the Anchorage Field Office (AFO), has reviewed the undertaking and made a reasonable effort to identify historic properties in the proposed APE. As detailed in the "Report of Determinations Under section 106 of the NHPA," the AFO Archaeologist has determined that the proposed project will have no effect to historic properties. This project falls under parameters set by the *Alaska State Protocol Agreement* as a routine undertaking, and information on the undertaking will be provided to the Alaska State Historic Preservation Office on an annual basis, as outlined in the *State Protocol Agreement*.

Extraordinary Circumstances

"Extraordinary circumstances" are circumstances in which actions that are otherwise categorically excluded from the requirements under NEPA to prepare an EA or EIS may have a significant environmental effect and require additional analysis and action. This action does not meet any of the applicable extraordinary circumstances. The DOI's list of extraordinary circumstances can be found at 43 CFR 46.215 and Appendix 5 of the BLM NEPA Handbook.

Decision and Rationale on Action

I have decided to implement UOCC's Sundry Notice of Intent to abandon and deconstruct Plant 10 and related structures and equipment at the Swanson River Field with the following Conditions of Approval (COAs):

The operator must comply with all Required Operating Procedures, stipulations, and terms and conditions outlined in the Approved Ring of Fire Resource Management Plan and Record of Decision, and the Final Revised Comprehensive Conservation Plan and Environmental Impact Statement Kenai National Wildlife Refuge.

The above COAs and terms and conditions provide justification for this decision and may not be segregated from project implementation without further NEPA review. In addition, I have reviewed the plan conformance statement and have determined that the proposed activity is in conformance with the applicable land use plans. Further, I have reviewed the proposal to ensure the appropriate exclusion category as described in Section 390 of the Energy Policy Act of 2005 has been correctly applied. It is my determination that no further environmental analysis is required.



Matthew S. Varner
Acting Field Manager, Anchorage Field Office

5/23/2011

Date

Administrative Review or Appeal Opportunities

Under the Bureau of Land Management's regulations addressed in 43 CFR 3165, the decision to approve a Sundry Notice is subject to appeal and administrative review. An administrative review must be conducted in accordance with 43 CFR 3165.3 and must take place prior to pursuing an appeal to the Interior Board of Land Appeals.

Any adversely affected party may request an administrative review, before the State Director, either with or without oral presentation. Such a request must include information required under 43 CFR 3165.3(b) (State Director Review (SDR)), including all supporting documentations. Such a request must be filed in writing to the State Director, Bureau of Land Management, 222 West 7th Avenue, Anchorage, AK, 99513 no later than 20 business days of the date this Decision Record is received or considered to have been received. Upon request and showing of good cause, an extension for submitting supporting/additional data may be granted by the State Director.

Any party who is adversely affected by the State Director's decision may appeal that decision to the Interior Board of Land Appeals in accordance with 43 CFR 3165.4.

Contact Person

For additional information concerning this decision, contact:

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